

Commissioners,

My name is Tim Gorman and I am an amateur Extra class licensee, callsign AB0WR.

This petition does not address in any way how the Commission is to meet its obligation under Part 97, Section 97.1(c) to implement rules which provide for advancing skills in the communication phase of the art. While the Amateur Radio Service may be primarily a technical service it is not just that. It is also a communications service as recognized in Part 97, Section 97.1.(a) and Section 97.1(c). Under Section 97.1(c) there is an obligation for the Commission to provide encouragement and improvement of the amateur service through rules which advance skills in the communication phase of the art. Under the current license structure, Element 1 is the only part of the license structure that provides a positive, measurable advancement in the communication phase of the art.

Section 97.1(c) does not require that the advancing skills in the communication phase of the art be in a so-called modern means of communication. Proficiency in receiving Morse code at the 5 wpm level is probably the simplest, and easiest means of meeting this requirement. Testing skill at communicating using any other method would be more difficult to implement and would certainly provide a higher hurdle to new applicants than the Morse code testing, especially to applicants with physical challenges.

I respectfully request that this petition not be considered because it does not allow the Commission to meet its full obligations under Title 47, Part 97, Section 97.1(c).

Respectfully yours,

Tim Gorman AB0WR